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August 8, 2023

**Via ECF**

Honorable Alvin K. Hellerstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

**Re: *CipherBlade LLC (Pennsylvania) v. CipherBlade LLC (Alaska) et al.*, 1:23-CV-05671-AKH**

Dear Judge Hellerstein:

We write on behalf of our client Plaintiff, CipherBlade LLC ("CipherBlade PA"), as well as Defendants CipherBlade LLC, an Alaska Limited Liability Corporation, Manuel Kriz, Michael Krause, Jorn Henrik Bernhard Janssen, Justin Maile, Ioana Vidrasan, CipherBlade APAC PTE Ltd., Jussi Aittola, omega3zone Global Ltd., Paul Marnitz, Inquisita Solutions Ltd., and Green Stone Business Advisory FZ LLC, represented by Steptoe & Johnson LLP, (collectively "the Parties"), regarding the above-referenced matter.

On August 3, 2023, the Parties appeared before Your Honor regarding Plaintiff's Application for a Temporary Restraining Order, Preservation Order, Expedited Discovery, an Alternative Service Order, and an Order to Show Cause Scheduling Preliminary Injunction Motion (the "Application", ECF 8 and 9). At that hearing, Your Honor ordered that ""[e]xcept as to areas of agreement between the parties as defined in the stipulation to be filed on or before August 8, 2023, Plaintiff's motion for emergency relief is denied." (ECF 30).

Since then, the Parties have agreed to the attached Stipulation and [Proposed] Order, which presently obviates the need for further briefing on the Application. Therefore, we jointly request that Your Honor enter the attached Stipulation and Order.

We thank the Court for its time and remain available to conference this matter.

Respectfully submitted,



Alexander J. Urbelis

cc: Michael Scavelli



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